

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

NATIONAL RIFLE ASSOCIATION OF
AMERICA,

Plaintiff and Counter-Defendant,

v.

Case No. 3:19-cv-02074-G

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER, AND
MELANIE MONTGOMERY

Defendants.

ACKERMAN MCQUEEN'S DEPOSITION DESIGNATIONS

Pursuant to the Court's October 13, 2020 Scheduling Order (ECF 174), as amended (ECF 358), Defendant/Counter-Plaintiff Ackerman McQueen, Inc. ("AMc"), Defendants Mercury Group, Inc. ("Mercury"), Henry Martin ("Martin"), William Winkler ("Winkler"), and Melanie Montgomery ("Montgomery") (collectively, the "Ackerman McQueen Parties") hereby submit these *Deposition Designations* (the "Designations") for the following witnesses. The Ackerman McQueen Parties submit these designations without waiver of (1) any of the Ackerman McQueen Parties' objections asserted in the designated portions, (2) any other objections based on limine rulings, relevance, or other legal grounds, or (3) the Ackerman McQueen Parties' right to amend, supplement, and/or withdraw designations as necessary before or during trial in response to the circumstance of trial.

I. WITNESSES TO BE CALLED BY DEPOSITION

1. Boren, Daniel (November 3, 2020 - Texas Action).

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2. Brewer, Skye (August 11, 2021 – Texas Action).

**Excluding line 1 from every designation as non-substantive testimony.

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3. Cox, Chris (July 27, 2021 – Texas Action).

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4. Hart, Steve (February 4, 2020 – Virginia Action).

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6. North, Lt. Col. Oliver (December 18, 2019 – Virginia Action).

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February 25, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2022, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Brian E. Mason

BRIAN E. MASON